

TECHNICAL STATUS REPORT

CH2M HILL

PREPARED FOR: Tom Post/EPA Region 10

DATE: February 9, 1994

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TECHNICAL STATUS REPORT

PREPARED FOR: Tom Post/EPA Region 10

PREPARED BY: Patt O'Flaherty/CH2M HILL

COPIES: Byung Maeng/Ecology NWRO

DATE: February 8, 1993

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc, Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: January 1 through January 31, 1994

PROJECT: SEA35051.A1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task A2--Applicable Permits

A letter is being prepared by RPI for submittal to U.S. EPA (Post) and Ecology (Llewellyn) concerning the identification of a NPDES permit writer for facility stormwater and remediation discharges.

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Task A3--Interim Measures

ETC faxed the results of a flashpoint (ignitability) test conducted on the LNAPL collected from Monitoring Well MW-12 on January 11, 1994. The results(copy attached) indicate a 78°C flashpoint; this is above the 60°C threshold for an ignitable hazardous waste.

Previous analyses of soil cuttings generated during the installation of MW-12 demonstrates this soil did not designate as a dangerous waste. These analyses were submitted to EPA with the September 1993 Progress Report. Soil from the installation of MW-12 is being retained at the Facility.

The ignitability test of LNAPL concludes its chemical and physical testing. All results will be used to complete its waste disposal profile. The LNAPL disposal firm will be approved of by RPI's corporate Health, Safety, & Environmental Affairs Division who are responsible for disposal contractor audits. Unless field testing conducted during the RFI demonstrate a different character to this material, it will be designated as nonhazardous solid waste.

The FRH250-SOS-TID automated skimmer manufactured by Clean Environment Equipment has been selected for LNAPL recovery at MW-12. The equipment was ordered and delivery is expected in early February. Per Rhône-Poulenc's agreement with the vendor, the system will be operated on a trial basis for 30 days. If the equipment performs satisfactorily, Rhône-Poulenc will purchase the equipment and continue to operate it. If not, other systems will be evaluated.

The existing 29,000 gal capacity funnel tank located to the west of MW-12 will be used to collect and store the recovered LNAPL material. LNAPL will be removed from this tank on a regularly scheduled basis. Necessary tank fittings were ordered to connect this tank to the product recovery pump.

Task A4-RFI Workplan

On January 12, RPI provided to CH2M HILL the revisions to the draft RFI Workplan (pages 3-8 and 4-67) that were agreed to by U.S. EPA and RPI. On January 18, CH2M HILL incorporated these revisions with a revised Table of Contents and Page 5-3 and submitted replacement pages to U.S. EPA for final Workplan Approval.

Task A5-RFI Field Investigation

On January 6, 1994 CH2M HILL (O'Flaherty, Kunkel, and Leck) met with ETC (Jenkins, Bruton, & Wunderlich) to review outstanding issues related to laboratory and RFI field coordination. One issue discussed subsequently with U.S. EPA (Post) and RPI (Liu) was to replace acetone with methanol for decontamination of field equipment. This suggested replacement is because acetone is a target analyte. The substitution was approved by both U.S. EPA and RPI before field activities commenced.

Tacoma Pump & Drilling was selected to undertake the drilling and sampling at the RPI Facility. A copy of the Consent Order was provided to Tacoma Pump & Drilling in July 1993 when they were hired to replace monitoring well G-5 with MW-12.

A copy of the proposed RFI field schedule listing activities through the last week of March 1994 is attached. On January 21, U.S. EPA (Post) was notified by CH2M HILL (O'Flaherty) that the Hydropunch survey will be postponed until February 28, 1994.

RFI field work started the week of January 10, 1994. The first round of groundwater samples were collected (30 wells) from January 17 through January 31, 1994. This included nine wells which were sampled for Appendix IX priority pollutants. The 3-week groundwater level monitoring program began on January 17, 1994 and is scheduled to end February 7, 1994.

A reduced equipment blank schedule (collection and analyses) was proposed to and approved by U.S. EPA and RPI. Because groundwater sampling equipment is decontaminated in the laboratory in batches, it was agreed to collect an equipment blank for the first Appendix IX analytes and thereafter to correspond to respective analyses whenever a new batch of decontaminated bailers are delivered (approximately every other day). Samples will also be extracted but not analyzed unless groundwater results show the presence of constituents that may be suspected of being introduced from field or laboratory practices.

Shallow surficial soil samples not covered by concrete or asphalt were collected during the week of January 17, 1994. At the same time Tacoma Pump & Drilling commenced concrete coring and cutting of the various Facility Investigation Areas targeted for shallow soil sampling. Cutting concrete has proven to be far more time consuming than was anticipated because in most places the concrete slabs are very thick. Furthermore, efforts to locate a WISHA/OSHA certified concrete cutter (for concurrent work efforts) have been unsuccessful. Consequently, Tacoma Pump and Drilling will continue to cut concrete because they have health & safety trained staff and readily available saw-cutting equipment.

On a related issue, U.S. EPA (Post) was contacted by CH2M HILL (O'Flaherty) on January 19, 1994 because two soil samples (Nos. 8 and 9) to be collected from Investigation Area A3/ Laboratory and Compressor Area (see Figure 4-5 in the RFI workplan) could not easily be collected from below the existing concrete slab which was determined to be at least 4-feet thick. Following U.S. EPA's suggestion, CH2M HILL reviewed the history of PCB detections in soil from this area and observed that Dames & Moore collected two samples (K1 and K2) in their study area K from this vicinity (on either side of the former compressor shed). Both samples were composited into one sample with an analytical result of 480 ppb. As agreed to by EPA, instead of sampling below the slab, CH2M HILL relocated samples 8 and 9 from this area to the same general area as K1 and K2 previously collected by Dames & Moore. These new samples will not be composited for analysis. In addition, Sample No. 2 and 4 which are part of the random grid located in Investigation Area A3 will also be tested for PCBs and multi-chlorinated benzenes in addition to the analyses proposed in the approved Workplan.

Associated laboratory analyses is in progress; ETC schedules a sample pick up directly from the facility at 3:00 p.m. each day sampling occurs. This arrangement has been determined to be very helpful to completing daily field obligations and paperwork for CH2M HILL field staff.

The literature search for arsenic and PAH contamination within the general vicinity of the facility (both groundwater and soils) has been started.

Deliverables Submitted

The December Progress Report to U.S. EPA on January 5, 1994.

Corrections to the RFI Workplan were submitted to U.S. EPA on January 18, 1994.

Outstanding Issues

None to report.

Activities Planned During Next Reporting Period

Task A2-Applicable Permits

CH2M HILL and Hays Consulting will commence assembling information to identify what will be needed in RPI's NPDES permit application. A cost estimate will be prepared if sufficient information is available and if a regulatory contact has been identified by the Agencies.

CH2M HILL will attend a public meeting sponsored by Ecology on February 8 in Olympia. The topic of this meeting is the state's NPDES permit program, permitting fees, and types of NPDES permits including those issued to Facility's undergoing RCRA Corrective Action.

Task A3-Interim Measures

The LNAPL recovery equipment will be installed and start-up operations will be initiated.

Task A5-RFI Field Investigation

The RFI field work will continue. Analysis of Round 1 groundwater samples should begin to be available by the last week in February. Soil results should follow in the first week of March. All laboratory results will be reviewed and validated as they become available. The 3-week groundwater level monitoring program will be completed on February 7. The four rounds of manual water level measurements are scheduled for February 4. The soil borings requiring a drill rig are scheduled to begin the week of February 21. The Hydropunch groundwater investigation will commence the week of February 28 and continue for approximately two to three weeks.

A draft summary of the literature search for information pertaining to PAH and Arsenic levels in ambient soil and groundwater will be available for U.S. EPA on or before April 1, 1994.

je/rhône-p/progress/stat294.epa

RHONE-POULENC, INC. RFI FIELD SCHEDULE FOR JANUARY, FEBRUARY, AND MARCH 1994

| TASK | JANUARY | | | | FEBRUARY | | | | MARCH | | | |
|---|---------|--------|---|--------|----------|--------|--------|--------|--------|--------|--------|--------|
| | Week 1 | Week 2 | Week 3 | Week 4 | Week 1 | Week 2 | Week 3 | Week 4 | Week 1 | Week 2 | Week 3 | Week 4 |
| Equipment acquisition | | | (misc. field equipment , unspecified needs) | | | | | | | | | |
| Groundwater level monitoring (electronic) | | | 1/17 | | | | | | | | | |
| Groundwater level monitoring (manual) | | | | 1/31 | 2/4 | | | | | | | |
| Groundwater sampling (Round 1) | | | 1/17 | | 2/2 | | | | | | | |
| Soil borings - Deep - Shallow | | | 1/17 | | 2/4 | | 2/21 | | | 3/11 | | |
| Hydropunch | | | | | | | | 2/28 | 3/4 | | | |
| Slug testing | | | | | | | | | | | | |
| Site survey (biological) | | | | | | | | | | | | |
| Sediment sampling | | | | | | 2/8 | | | | | | |
| Seep sampling (after rainfall event) | | | | | | | | | | | | |

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ETC-NOP

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FAX TRANSMITTAL

ETC/Northwest

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(206) 885-0083

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DATE:

TO:

CC:

COMPANY:

FAX NUMBER:

FROM:

January 26, 1994

Patt O'Flaherty

CH2M HILL

(206) 462-5957

Rand Jenkins

COMMENTS AND MESSAGES:

The Ignitability result obtained for your sample RPIMW12, received on 1/11/94, was **78 °C** using Method 1010 (Pensky-Martens Closed-Cup). Sorry to keep you waiting for this answer.

I'm working up the pricing modification memo I mentioned, that will cover the items not included in the original contract. I should have it to you by tomorrow.

Also included with this fax is a copy of my tracking sheet for the water samples. I have a similar one for soils. These were derived from Doug's tables and the Workplan. I am monitoring the daily receipts and COCs against them. If you'd like to receive copies as we go along, let me know.

Regards,
Rand

Should you not receive 3 pages (including this transmittal sheet) please contact the sender.

| PARAMETER SCHEDULE (Round 1) | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------------|-----------|---------|-------|--------------|---------------|-------------|-------|-----------|-----------|------------|---------------|---------------|---------|---------|------|----------------|---------------|---------------|------------------------|----------|----------------------|-----------------------------------|
| CH2M HILL RHONE-POULENC Project | | | | | | | | | | | | | | | | | | | | | | |
| GROUNDWATERS | | | | | | | | | | | | | | | | | | | | | | |
| Area/Well | Sample ID | Lab ID | SDG | Date Sampled | Date Received | Appendix IX | | | | | | | | | | Gen. H2O Qual. | | | Bio Act | | Pesticides/PCBs | Comments |
| | | | | | | VOCs | SVOCs | Pest/PCBs | O-P Pests | Herbicides | Metals, Diss. | Metals, Total | Cyanide | Sulfide | VOCs | SVOCs | Metals, Diss. | Metals, Total | Formaldehyde, 8315-mod | Vanillin | I-propanol, 8015-mod | |
| BG/E3 | 01-MWE3 | 5199-01 | RPW02 | 1/17/94 | 1/17/94 | | | | | | | | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | |
| BG/DM1A | 02-DM1A | 5200-01 | RPW01 | 1/17/94 | 1/17/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | |
| BG/DM1B | 03-DM1B | 5202-03 | RPW01 | 1/18/94 | 1/18/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | |
| BG/DM9 | 04-DM9 | 5202-02 | RPW01 | 1/18/94 | 1/18/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | added 1/12/94 |
| A9/C1 | 05-MWC1 | 5201-01 | RPW02 | 1/18/94 | 1/18/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A9/B1A | 06-MWB1A | 5207-01 | RPW02 | 1/19/94 | 1/19/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A9/B1B | 07-MWB1B | 5207-02 | RPW02 | 1/19/94 | 1/19/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A9/A4 | 08-MWA4 | 5207-05 | RPW02 | 1/19/94 | 1/19/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A1/A2 | 09-MWA2 | 5207-04 | RPW02 | 1/19/94 | 1/19/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A1/DM3A | 10-DM3A | 5210-01 | RPW01 | 1/20/94 | 1/20/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | |
| A1/DM3B | 11-DM3B | 5210-03 | RPW01 | 1/20/94 | 1/20/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | R |
| A1/A9 | 16-MWA9 | 5214-01 | RPW02 | 1/24/94 | 1/24/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | R=run by mistake |
| A2/DM4 | 17-DM4 | 5214-02 | RPW02 | 1/24/94 | 1/24/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A2/B4 | | | | | | | | | | | | | | | X | X | X | X | X | X | X | |
| A2/B2 | 18-MWB2 | 5215-05 | RPW02 | 1/24/94 | 1/25/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | QC Sample |
| A2/DM5 | 19-DM5 | 5215-02 | RPW02 | 1/25/94 | 1/25/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A2/B20 | 20-MWB20 | 5215-04 | RPW02 | 1/25/94 | 1/25/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A2/B6 | 12-MWB6 | 5210-04 | RPW01 | 1/20/94 | 1/20/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | Z=analysis missed |
| A2/B5 | 21-MWB5 | 5215-06 | RPW02 | 1/25/94 | 1/25/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A8/DM6 | 22-DM6 | 5215-03 | RPW02 | 1/25/94 | 1/25/94 | | | | | | | | | | 1 | 1 | 1 | 1 | | 1 | 1 | |
| A7/G1 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A7/G21 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A7/H9 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A5/DM2A | 13-DM2A | 5212-01 | RPW01 | 1/20/94 | 1/21/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | |
| A5/DM2B | 14-DM2B | 5212-03 | RPW01 | 1/21/94 | 1/21/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | QC Sample |
| A5/H6 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A5/DM8 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A6/G3 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A6/DM7 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A4/H11 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A4/H10 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A4/H11 | | | | | | | | | | | | | | | X | X | X | X | | X | X | |
| A4/MW12 | 15-MW12 | 5213-01 | RPW01 | 1/24/94 | 1/24/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | X=not received, run from TDS etc. |
| Additional Samples: | TB-01 | 5199-02 | RPW02 | 1/17/94 | 1/17/94 | | | | | | | | | | 1 | | | | | | | |
| | TB-02 | 5202-05 | RPW01 | 1/18/94 | 1/18/94 | 1 | | | | | | | | | | | | | | | | |
| | TB-03 | 5207-03 | RPW02 | 1/19/94 | 1/19/94 | | | | | | | | | | 1 | | | | | | | |
| | TB-04 | 5210-02 | RPW01 | 1/20/94 | 1/20/94 | 1 | | | | | | | | | | | | | | | | |
| | TB-05 | 5212-02 | RPW01 | 1/20/94 | 1/21/94 | 1 | | | | | | | | | | | | | | | | |

RP_ALLPW.XLS

1/26/94

| PARAMETER SCHEDULE (Round 1) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------------------------------|------------|---------|-------|-------------------------|---------------|-------------|-------|-----------|-----------|------------|---------------|---------------|---------|---------|------|-------|---------------|---------------|------------------------|----------|----------------------|------------------|---------|-------------------|-----|------------------|--------------------------|-------------------|----------------------|-----------------|------|----------|---------------|
| CH2M HILL/ RHONE-POULENC Project | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GROUNDWATERS | | | | | | Appendix IX | | | | | | | | | | | | | | | Gen. H2O Qual. | | | Bio Act | | | | | | | | | |
| Area/Well | Sample ID. | Lab ID. | SDG | Date Sampled | Date Received | VOCs | SVOCs | Pest/PCBs | O-P Pests | Herbicides | Metals, Diss. | Metals, Total | Cyanide | Sulfide | VOCs | SVOCs | Metals, Diss. | Metals, Total | Formaldehyde, 8315-mod | Vanillin | i-propanol, 8015-mod | Anions (SO4, Cl) | Sulfide | Alk. CO3/HCO3 TDS | TOC | TKN, Phos./Total | Anions (NO3, NO2, O-PO4) | Pentachlorophenol | Chlorinated Benzenes | Pesticides/PCBs | PCBs | Comments | |
| | TB-06 | 5213-02 | RPW01 | 1/24/94 | 1/24/94 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | TB-07 | 5215-01 | RPW02 | 1/25/94 | 1/25/94 | | | | | | | | | | 1 | | | | | | | | | | | | | | | | | | |
| | EB-01 | 5202-01 | RPW01 | 1/17/94 | 1/18/94 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | | | | |
| | EB-02 | 5202-04 | RPW01 | 1/18/94 | 1/18/94 | 1 | P | | | | P | P | | | | | | | | | | | | | | | | | | | | | P=Prep & Hold |
| | EB-03 | 5212-04 | RPW01 | 1/21/94 | 1/21/94 | 1 | P | | | | P | P | | | | | | | | | | | | | | | | | | | | | P=Prep & Hold |
| | | | | TOTAL received to date: | | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 13 | 13 | 13 | 13 | 10 | 19 | 19 | 21 | 22 | 22 | 22 | 22 | 7 | 6 | 0 | 0 | 0 | 0 | |



RHÔNE-POULENC INC. *to*
LEGAL DEPARTMENT-BHL I
TEL: (908) 821-3533
FAX: (908) 821-2787
GEORGE S. GOODRIDGE
SENIOR ENVIRONMENTAL ATTORNEY *Law*

To Brent Gilkousen
Date 2/22/94

| | | |
|---|--|--|
| Please: <input type="checkbox"/> Attend to <input type="checkbox"/> Note and return <input type="checkbox"/> Note and forward to Files <input type="checkbox"/> See (phone) me re attached | <input type="checkbox"/> Prepare reply for my signature <input type="checkbox"/> Send me information required to answer <input checked="" type="checkbox"/> For your information <input type="checkbox"/> As per conversation | <input type="checkbox"/> As requested <input type="checkbox"/> For your comments and suggestions <input type="checkbox"/> Does attached meet with your approval? <input type="checkbox"/> For signature, if you approve |
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